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June 16, 2021

VIA ECF

The Honorable Sanket J. Bulsara
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Macas v. Alex's Auto Body 1 Inc. et ano.* -
Case No.: 1:18-CV-07184 (RJD)(SJB)**

Dear Judge Bulsara:

As you are aware, we represent Plaintiff Freddy V. Macas ("Plaintiff") in the above-referenced matter. We provide this status report following the settlement conference held before Your Honor on June 8, 2021.

Following discussion with my client, he has agreed to resolve the matter for \$40,000.00 along the terms discussed during the conference (all of which are not detailed here). Subject to execution of an agreed-upon settlement agreement which will be subject to Court approval and supervision, there will be an initial payment of \$10,000.00 as well as the return of Plaintiff's tools in the condition memorialized previously by a third party. Thereafter, there will be equal payments spread over an additional eleven (11) months. There will be no confidentiality provision in the agreement and Plaintiff's pending workers compensation claims will be excluded from the settlement. Moreover, there will be a confession of judgment as to both Defendants in the amount of \$120,000.00 which will be filed should Defendants miss any payment, subject to a notice and cure period to be included in the settlement agreement.

Respectfully submitted,

VALLI KANE & VAGNINI LLP
/s/ Robert R. Barravecchio
Robert R. Barravecchio

cc: Counsel (via ECF)

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